

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP., Plaintiff,	§ § Case No. 2:24-cv-00093-JRG § (Lead Case)
v.	§ §
HEWLETT PACKARD ENTERPRISE COMPANY, Defendant.	§ <b>JURY TRIAL DEMANDED</b> § § §
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VIRTAMOVE, CORP., Plaintiff,	§ § Case No. 2:24-CV-00064-JRG § (Member Case)
v.	§ §
INTERNATIONAL BUSINESS MACHINES CORP., Defendant.	§ <b>JURY TRIAL DEMANDED</b> § § §

**JOINT MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION AND REPLY  
TO MOTION TO TRANSFER (DKT. 87)**

Plaintiff VirtaMove, Corp. (“Plaintiff”) and Defendant, Hewlett Packard Enterprise (“HPE” or “Defendant”) respectfully move for a one-week extension of time for (1) Plaintiff to file its response to Defendant HPE’s Motion to Transfer Venue to the Northern District of California (Dkt. 87) and (2) a one-week extension for Defendant to file its reply in support of its motion to transfer.

With a one-week extension from October 29, 2024, the deadline for Plaintiff’s response would be extended to November 5, 2024. Defendant’s deadline to reply in support of the Motion would be due on November 12, 2024 and extended to November 19, 2024. These extensions are

not being sought for purposes of delay, but rather to ensure the parties and their counsel have adequate time to address the issues raised in Defendant's Motion.

Counsel for the parties have conferred and all parties stipulate to this extension. As part of the stipulation, Plaintiff will not use the extension against Defendant, for example, to argue delay. Accordingly, Plaintiff and Defendant respectfully request that the Court grant the motion and enter the attached proposed Order.

Dated: October 28, 2024

Respectfully submitted,

By: /s/ Qi (Peter) Tong

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

*/s/ Mackenzie Paladino*

Mackenzie Paladino

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on October 28, 2024.

*/s/ Mackenzie Paladino*

Mackenzie Paladino